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THE CITY OF NEW YORK LAW DEPARTMENT

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November 24, 2020

BY ECF

JAMES E. JOHNSON

Corporation Counsel

Honorable Mary Kay Vyskocil United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Ryan Jhagroo v. Officer Brown, et ano., 16-CV-3426 (LTS)(SDA)

Your Honor:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney for defendants Correction Officer Hudson and Correction Officer Brown in the above-referenced case. I write jointly with counsel for plaintiff to respectfully request an extension of time to submit the required pretrial filings in this case.

By Order dated October 7, 2020, the Court directed the parties to file their proposed Joint Pretrial Order by November 30, 2020, and all other pretrial filings required by the Court's Individual Rules by December 7, 2020. Since that time, the parties have been working diligently to prepare the Joint Pretrial Order. However, due to the Thanksgiving holiday and conflicts in counsel's schedules, the parties require additional time to finalize and file the Joint Pretrial Order. Accordingly, the parties respectfully request an extension of time to submit the pretrial filings in this case, and propose the following modified schedule:

- Joint Pretrial Order to be filed by December 7, 2020;
- All other pretrial filings to be filed by December 21, 2020; and

• Oppositions to motions in limine, if any, to be filed by January 6, 2021.

The parties thank the Court for its time and consideration in this matter.

Respectfully submitted,

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Geoffrey M. Stannard
Assistant Corporation Counsel

cc: **BY ECF**

David Kerschner, Esq., Attorney for Plaintiff

Granted. SO ORDERED.

Date: Nov. 24, 2020 New York, New York

United States District Judge